

| User Selection Criteria |
|---|
| <div><div>Handler ID: NYD982719122</div><div>Evaluation Date Range: From: 10/01/1990 To: 08/28/2019</div></div> |
| Report Results |
| <div><div>Number of Handlers: 1</div><div>Number of Pages: 9</div></div> |
| Report Description |
| <div><p>This report provides a complete listing of evaluation, violation and enforcement activities for each handler, including all orphan records. Below the handler id information, the data is presented in three sections; evaluations, violations and enforcements. Notes are provided in each respective section.</p></div> |

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

BASF COLORS & EFFECTS USA LLC

County WESTCHESTER / NY119

NYD982719122

Location: 1057 LOWER S ST; PEEKSKILL, NY 10566

REGION 02

Mailing: 1057 LOWER SOUTH ST; PEEKSKILL, NY 10566

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|-----------------------|-------|--------------------|-----------|-----------------------|-------|-------------------------|---|-----------------------|---|--------------|---|
| Activity Location: | NY | State District: | NYSDEC R3 | Accessibility: | | Non-Notifier: | | Extract Flag: | Y | Active Site: | Y |
| Generator: | SQG | Operating TSDF: | ----- | Offsite Receiver: | N | State Unaddressed SNC: | N | EPA Unaddressed SNC: | N | | |
| Short Term Generator: | N | Transporter: | N | IC in Place: | N | State Addressed SNC: | N | EPA Addressed SNC: | N | | |
| Full Enforcement: | ----- | Transfer Facility: | N | EI Indicator (HE/GW): | N / N | State SNC w/Comp Sched: | N | EPA SNC w/Comp Sched: | N | | |
| CA Wrkld: | N | Converter: | ----- | HSM: | NN | | | | | | |
| Active State Gen: | Y | State TSDF: | ----- | Subpart K: | ---- | | | | | | |

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|-----------------------|--|--------------------|----|------------------------|-------|-------------|-----|-----------------|-------|------------------|------------|------------------|----|
| CEI Evaluation | 03/05/2015 | Activity Location: | NY | By: | STATE | Identifier: | 001 | Person: | NYWME | Suborganization: | R3 | Found Violation: | NO |
| NOC Date: | | Citizen Complaint: | NO | Multimedia Inspection: | NO | Sampling: | NO | Not Subtitle C: | NO | Day Zero: | 03/05/2015 | Focus Area: | |
| Eval. Notes: | SQG. The site has had 3 names Mearl Corp., Englehardt, and BASF Corp. They still make pearlized pigments. Hazardous Wastes are generated from raw product QC checks, and product QC checks and occasional maintenance wastes. The site was clean and the region sent a TKU. | | | | | | | | | | | | |

No Linked Violations

| | | | | | | | | | | | | | |
|-----------------------|------------|--------------------|----|------------------------|-------|-------------|-----|-----------------|-------|------------------|----|------------------|----|
| SNN Evaluation | 02/17/2005 | Activity Location: | NY | By: | STATE | Identifier: | 001 | Person: | NYSGH | Suborganization: | CO | Found Violation: | NO |
| NOC Date: | | Citizen Complaint: | NO | Multimedia Inspection: | NO | Sampling: | NO | Not Subtitle C: | NO | Day Zero: | | Focus Area: | |

No Linked Violations

| | | | | | | | | | | | | | |
|-----------------------|------------|--------------------|----|------------------------|-------|-------------|-----|-----------------|-------|------------------|----|------------------|-----|
| CEI Evaluation | 02/16/2005 | Activity Location: | NY | By: | STATE | Identifier: | 001 | Person: | NYSGH | Suborganization: | CO | Found Violation: | YES |
| NOC Date: | | Citizen Complaint: | NO | Multimedia Inspection: | NO | Sampling: | NO | Not Subtitle C: | NO | Day Zero: | | Focus Area: | |
| Eval. Notes: | sqq | | | | | | | | | | | | |

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|------------------|----------------------------|--------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: | NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 26 |
| | Former Citation: | SR - 374-3.2(e)(5) | | | | |

Viol. Notes: Requires that the containers containing universal waste lamps must be labeled.

No Linked Enforcements

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|------------------|----------------------------|--------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: | NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 27 |
| | Former Citation: | SR - 374-3.2(f)(3) | | | | |

Viol. Notes: Hanlder must demonstrate the length of time universal waste lamps are being stored.

No Linked Enforcements

Note: Penalty information associated with an enforcement action is reported with the enforcement action. For enforcement actions associated with multiple violations, the penalty information will be reported with each violation, however, the penalty is only assessed once, regardless of the number of violations associated with the enforcement.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

| | | | | | |
|------------------|--|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 28 |
| | Former Citation:SR - 372.2(b)(2)(i)&(ii) | | | | |

Viol. Notes: The generator must have written communication from the TSDF and transporter that they are authorized to accept the hazardous waste.

No Linked Enforcements

| | | | | | |
|------------------|------------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 29 |
| | Former Citation:SR - 373-3.4(d)(2) | | | | |

Viol. Notes: Requires the generator to submit copies of their contingency plan to local emergency authorities.

No Linked Enforcements

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|------------------|---------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 30 |
| | Former Citation:SR - 374-3.2(g) | | | | |

Viol. Notes: The handler must inform all employees who handle universal waste lamps about proper handling and emergency procedures.

No Linked Enforcements

| | | | | | |
|------------------|---------------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 03/15/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 31 |
| | Former Citation:SR - 376.1(g)(1)(vii) | | | | |

Viol. Notes: Requires the generator to submit a one-time notification that their restricted waste is excluded from the definition of hazardous or solid waste.

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|-----------------|-----------------------|---------------------|----------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 120 | Action Date: 03/03/2005 | Identifier: 001 |
| | Docket: | Agency: STATE | Responsible Person: NYS GH | Suborganization: CO |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|------------------|---------------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 02/16/2005 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/24/2005 | RTC Qualifier: DOCUMENTED | Sequence Number: 32 |
| | Former Citation:SR - 374-3.2(d)(4)(i) | | | | |

Viol. Notes: Universal waste lamps must be stored in a closed, structurally sound container.

No Linked Enforcements

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

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|-----------------------|------------------|--------------------|----|------------------------|-------|-------------|-----|-----------------|-------|------------------|----|------------------|----|
| SNY Evaluation | 09/23/2004 | Activity Location: | NY | By: | STATE | Identifier: | 001 | Person: | NYWBY | Suborganization: | R3 | Found Violation: | NO |
| | NOC Date: | Citizen Complaint: | NO | Multimedia Inspection: | NO | Sampling: | NO | Not Subtitle C: | NO | Day Zero: | | Focus Area: | |
| | Eval. Notes: lqg | | | | | | | | | | | | |

No Linked Violations

| | | | | | | | | | | | | | |
|-----------------------|------------------|--------------------|----|------------------------|-------|-------------|-----|-----------------|-------|------------------|----|------------------|-----|
| CEI Evaluation | 06/29/2004 | Activity Location: | NY | By: | STATE | Identifier: | 001 | Person: | NYWBY | Suborganization: | R3 | Found Violation: | YES |
| | NOC Date: | Citizen Complaint: | NO | Multimedia Inspection: | NO | Sampling: | NO | Not Subtitle C: | NO | Day Zero: | | Focus Area: | |
| | Eval. Notes: lqg | | | | | | | | | | | | |

Violation Activity Location: NY Type: 262.A Determined Date: 06/29/2004 Determined By Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: Actual Compliance Date: 02/16/2005 RTC Qualifier: OBSERVED Sequence Number: 16
 Former Citation: SR - 372.2(a)(8)(i)(a)(2)

Viol. Notes: Accumulation containers must be marked with the words "Hazardous Waste" and with other words which identify the contents.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

Violation Activity Location: NY Type: 262.A Determined Date: 06/29/2004 Determined By Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: Actual Compliance Date: 02/16/2005 RTC Qualifier: OBSERVED Sequence Number: 17
 Former Citation: SR - 373-3.2(g)(4)(iv) & (g)(3)

Viol. Notes: Records must be kept that document that training or job experience has been given to and completed and records must be kept which document personnel have taken part in an annual review of initial training required.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|------------------|-------------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 18 |
| | Former Citation: SR - 373-3.9(d)(3) | | | | |

Viol. Notes: Containers must be marked with the words -Hazardous Waste- and with other words which identify its contents.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|------------------|---|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.B | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 19 |
| | Former Citation: SR - 372.2(b)(5)(i),(iii) & (b)(1) | | | | |

Viol. Notes: Hazrdous waste shipped off without a manifest and to an unauthorized facility. Manifest must be completed in accordance with the instructions found in Appendix 30 of Part 372.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

Note: Penalty information associated with an enforcement action is reported with the enforcement action. For enforcement actions associated with multiple violations, the penalty information will be reported with each violation, however, the penalty is only assessed once, regardless of the number of violations associated with the enforcement.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

| | | | | |
|-----------------------------|-----------------------|-----------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| | CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: |
| Enf. Notes: | | | | Appeal Resolved: |

| | | | | | |
|------------------|---|------------------------------------|-----------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 268.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 20 | |
| | Former Citation: SR - 376.1(g)(1)(i), (ii) and (vi) | | | | |

Viol. Notes: A determination must be made whether hazardous wastes have to be treated before land disposed. LDR notifications must include an EPA ID number. Supporting data used to make a restricted waste determination must be made available.

| | | | | |
|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| | CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: |
| Enf. Notes: | | | | Appeal Resolved: |

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|-----------------------------|-----------------------|-----------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| | CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: |
| Enf. Notes: | | | | Appeal Resolved: |

| | | | | | |
|------------------|---|------------------------------------|-----------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 268.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 21 | |
| | Former Citation: SR - 376.1(h)(1) & (2) | | | | |

Viol. Notes: An EPA hazardous waste code applicable to the waste must be determined. Treatment standards must be determined based on EPA waste codes.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| | CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: |
| Enf. Notes: | | | | Appeal Resolved: |

| | | | | |
|-----------------------------|-----------------------|-----------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| | CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: |
| Enf. Notes: | | | | Appeal Resolved: |

Note: Penalty information associated with an enforcement action is reported with the enforcement action. For enforcement actions associated with multiple violations, the penalty information will be reported with each violation, however, the penalty is only assessed once, regardless of the number of violations associated with the enforcement.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

| | | | | |
|--|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation Activity Location: NY | Type: 262.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 22 |
| Former Citation:SR - 373-3.9(d)(1) | | | | |

Viol. Notes: Accumulation containers must be closed when not in use.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

| | | | | |
|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|--|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation Activity Location: NY | Type: 262.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 23 |
| Former Citation:SR - 372.2(a)(8)(ii) | | | | |

Viol. Notes: The date upon which accumulation begins must be marked and visible for inspection.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|---|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation Activity Location: NY | Type: 262.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 24 |
| Former Citation:SR - 373-1.1(d)(1)(xii) | | | | |

Viol. Notes: Pre-treatment tanks must be marked with the words -Hazardous Waste- and with other words which identify its contents.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

| | | | | |
|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

| | | | | | |
|------------------|-----------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 06/29/2004 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: | | Actual Compliance Date: 02/16/2005 | RTC Qualifier: OBSERVED | Sequence Number: 25 |
| | Former Citation: SR - 372.2(a)(2) | | | | |

Viol. Notes: Failure to make a hazardous waste determination.

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|-----------------------------|-----------------------|-------------------------|---------------------------|----------------------|
| Enforcement: | Activity Location: NY | Type: 310 | Action Date: 11/23/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: | Final Monetary: \$9,000 | Collected: \$9,000 | Total Final: \$9,000 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

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|-----------------------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 210 | Action Date: 09/29/2004 | Identifier: 001 |
| | Docket: CO3200409283 | Agency: STATE | Responsible Person: NYTLR | Suborganization: CO |
| Penalty Information: | Proposed: \$14,000 | Final Monetary: | Collected: | Total Final: |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |
| Enf. Notes: | | | | |

| | | | | | | | |
|-----------------------|-----------------------|---------------------------|--------------|--------------------|---------------|---------------------|----------------------|
| CEI Evaluation | 12/06/1995 | Activity Location: NY | By: STATE | Identifier: 000 | Person: NYWME | Suborganization: R3 | Found Violation: YES |
| NOC Date: | Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area: | |
| Eval. Notes: | | | | | | | |

| | | | | | |
|------------------|---------------------------------------|-------------|------------------------------------|-----------------------------|---------------------------|
| Violation | Activity Location: NY | Type: 262.A | Determined Date: 01/16/1996 | Determined By Agency: STATE | Responsible Agency: STATE |
| | Scheduled Compliance Date: 02/16/1996 | | Actual Compliance Date: 02/22/1996 | RTC Qualifier: OBSERVED | Sequence Number: 14 |

Note: Penalty information associated with an enforcement action is reported with the enforcement action. For enforcement actions associated with multiple violations, the penalty information will be reported with each violation, however, the penalty is only assessed once, regardless of the number of violations associated with the enforcement.

BASF COLORS & EFFECTS USA LLC - continued

NYD982719122

| | | | | |
|-----------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 120 | Action Date: 01/16/1996 | Identifier: 000 |
| | Docket: | Agency: STATE | Responsible Person: NYWME | Suborganization: R3 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |

Violation Activity Location: NY Type: 268.A Determined Date: 01/16/1996 Determined By Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 02/16/1996 Actual Compliance Date: 02/22/1996 RTC Qualifier: OBSERVED Sequence Number: 15

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|-----------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 120 | Action Date: 01/16/1996 | Identifier: 000 |
| | Docket: | Agency: STATE | Responsible Person: NYWME | Suborganization: R3 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |

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|------------------------------|-----------------------|---------------------------|--------------|--------------------|---------------|----------------------|---------------------|
| CDI Evaluation | 03/03/1995 | Activity Location: NY | By: EPA | Identifier: 000 | Person: R2RFK | Suborganization: RCB | Found Violation: NO |
| NOC Date: | Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area: | |
| Eval. Notes: WASTE MIN AUDIT | | | | | | | |

No Linked Violations

| | | | | | | | |
|-----------------------|-----------------------|---------------------------|--------------|--------------------|---------------|---------------------|----------------------|
| CEI Evaluation | 03/29/1993 | Activity Location: NY | By: STATE | Identifier: 000 | Person: NYWME | Suborganization: R3 | Found Violation: YES |
| NOC Date: | Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area: | |

Violation Activity Location: NY Type: 264.A Determined Date: 06/23/1993 Determined By Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 07/23/1993 Actual Compliance Date: 11/08/1993 RTC Qualifier: OBSERVED Sequence Number: 13

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|-----------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 120 | Action Date: 06/23/1993 | Identifier: 000 |
| | Docket: | Agency: STATE | Responsible Person: NYWME | Suborganization: R3 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |

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|-----------------------|-----------------------|---------------------------|--------------|--------------------|---------------|---------------------|----------------------|
| CEI Evaluation | 09/25/1991 | Activity Location: NY | By: STATE | Identifier: 000 | Person: NYWME | Suborganization: R3 | Found Violation: YES |
| NOC Date: | Citizen Complaint: NO | Multimedia Inspection: NO | Sampling: NO | Not Subtitle C: NO | Day Zero: | Focus Area: | |

Violation Activity Location: NY Type: 264.A Determined Date: 08/20/1991 Determined By Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: 02/22/1992 Actual Compliance Date: 11/08/1993 RTC Qualifier: OBSERVED Sequence Number: 12

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|-----------------|-----------------------|---------------------|---------------------------|---------------------|
| Enforcement: | Activity Location: NY | Type: 120 | Action Date: 08/20/1991 | Identifier: 000 |
| | Docket: | Agency: STATE | Responsible Person: NYWME | Suborganization: R3 |
| CA Component: N | FA Requirement: | Disposition Status: | Appeal Initiated: | Appeal Resolved: |